

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE: :

PROSPECT MEDICAL HOLDINGS, : Chapter 11
INC., ET AL.,¹ :
 : Case No. 25-80002-SGJ
Debtors, :
 : Jointly Administered

**DIANE PANTANO'S MOTION FOR WAIVER
OF LOCAL COUNSEL**

The movant, Diane Pantano, hereby requests a waiver of the local counsel requirement of Rule 2090-4(a) of the Local Rules of Bankruptcy Court of the Northern District of Texas. The movant requests this relief so that her attorney, Marc J. Ubaldi, can represent her in this action without retaining local counsel.


The undersigned states as follows:

1. On January 11, 2025, the above-captioned debtors filed a voluntary petition for relief under Chapter 11 of the United States Code in the Northern District of Texas, thereby commencing these actions.
2. Local Rule 2090-4(a) requires an attorney appearing in the United States Bankruptcy Court for the Northern District of Texas to retain local counsel if that attorney does not reside or maintain an office within the Northern District of Texas, absent leave of the court.

¹ A complete list of each of the Debtors in these Chapter 11 cases may be obtained on the website of the Debtors' proposed claims and noticing agent at <http://omniagentsolutions.com/Prospect>. The Debtors' mailing address is 3824 Hughes Ave., Culver City, CA 90232.

3. The undersigned counsel is a solo practitioner located in Milford, Connecticut. He does not have a residence or office in the Northern District of Texas.
4. The movant is a plaintiff in a medical malpractice action currently pending in the Superior Court, Judicial District of Hartford, in Hartford, Connecticut. Two Prospect entities, Prospect Manchester Hospital, Inc. and Prospect ECHN, Inc., are defendants in that action. On January 17, 2025, these two defendants filed a Notice of Bankruptcy Petitions and Automatic Stay.
5. The undersigned counsel believes that his only involvement in this bankruptcy matter, in addition to proofs of claim already filed, will be seeking the lifting of the automatic stay, to move forward with the medical malpractice case.
6. In light of the foregoing, the movant asserts that good cause exists for a waiver of the local counsel requirement set forth in Local Rule 2090-4(a).

THE MOVANT
DIANE PANTANO

By: 

Marc J. Ubaldi
Law Office of Marc J. Ubaldi, LLC
135 Gulf Street
Milford, CT 06460
(T) (203) 802-5030
(F) (203) 306-3057
mju@ubaldilaw.com

Date: April 18, 2025

CERTIFICATE OF SERVICE

I hereby certify that on April 18, 2025, a copy of the foregoing was sent electronically to all parties via the electronic case filing system for the United States Bankruptcy Court for the Northern District of Texas.



Marc J. Ubaldi
Law Office of Marc J. Ubaldi, LLC